



University of Hawaii at Manoa

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April 19, 1990
RG:0098

Ms. Colleen O. Sathre, Director
Office of Planning and Policy
University of Hawaii
2444 Dole Street
Honolulu, Hawaii 96822

Dear Ms. Sathre:

**DLNR State Recreation Functional Plan
Agency Review Draft, March 26, 1990**

In response to your request of April 10th, I have reviewed the above cited plan with the assistance of Jacquelin Miller, Associate Environmental Coordinator. We note that the Environmental Center is cited as both an "Assisting Organization" and as the "Lead Organization" under ISSUE AREA #14. Wetlands Protection and Management, Objective B: Policy B(1); Implementing Actions B(1)a and B(1)b (page 37). Our participation at these levels is highly appropriate given the status of our ongoing efforts in developing an inventory of sensitive wetland ecosystems on the islands of Oahu and Maui and our development of a consolidated environmental data base for the information gathered as part of the two projects. Our three years experience on the Oahu and Maui wetland projects provides us with a firm grasp of the time, effort, personnel, and budget requirements to carry out the implementing actions requested under the cited "wetlands assessment threshold criteria".

Implementing Action B(1)a stipulates that evaluations of known wetlands are to be conducted using the "wetlands assessment threshold criteria". These "criteria" were developed in response to the 1986 Emergency Wetlands Resources Act. By this Act, the Secretary of the Interior was required to establish a National Wetlands Priority Conservation Plan to assist decisionmakers in identifying the types and locations of wetlands that would warrant consideration for Federal and State acquisition. The "wetlands assessment threshold criteria" serve as the mechanism whereby the "priorities for acquisition" of certain wetlands can be determined.

Ms. Colleen O. Sathre
April 19, 1990
Page 2

The recently completed work by the Environmental Center on wetlands on the island of Oahu was fairly comprehensive and identified 63 wetland sites. We would not expect that number to be increased significantly through compliance with the proposed Wetland Protection and Management Action. In contrast, the current inventory for Maui is limited to only 24 areas. That number may increase by at least 50 percent if all wetlands meeting the criteria set forth under section 301 of the Emergency Wetlands Resources Act of 1986 are included. Preliminary estimates suggest that approximately 50 sites will qualify as wetlands on Kauai. If we assume a similar number for Hawaii and perhaps 20 for Molokai and 10 for Lanai, we are approaching an estimated 200 to 250 sites.

Implementing Action B(1)(b) proposes that the information, evaluations, and priorities of the known wetlands (as identified and evaluated under Implementing Action B(1)(a)) be incorporated into the Environmental Center's existing wetland data base. While some of the information in the current wetland data base could be applied to the information required in the "wetlands assessment threshold criteria", significant revision of the data base will be required. Additional information will need to be gathered, and the present data base will need to be modified to meet the format of the required new "criteria".

Your memo requests that we provide budget estimates for those actions involving our unit. The previous work on the Oahu and Maui inventories was carried out under contract with the Department of Health. No general funds were allocated to this project, nor have any funds been included in our 1991-93 budget to carry out this work. We can, however, provide the following very close approximation of the funds that would be required for a complete statewide inventory of wetlands pursuant to the National Wetlands Priority Conservation Plan and the State Recreation Functional Plan.

Oahu	30,000
Maui	35,000
Kauai	55,000
Hawaii	55,000
Molokai	25,000
Lanai	15,000
<u>TOTAL</u>	<u>215,000</u>

These budgets will cover the personnel, including graduate assistants and a computer specialist, field work, and one dedicated 386 computer required to carry out the tasks specified.

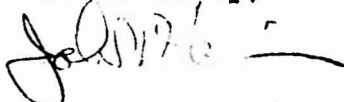
In our review of other sections of the Plan, we also noted the following:

Pages 18-20. Several actions involve the acquisition and/or development of archaeological and cultural resources. We strongly urge that the U.H. Anthropology Department (Michael Graves) and the Society for Hawaiian Archaeology be included as "Assisting Organizations".

Ms. Colleen O. Sathre
April 19, 1990
Page 3

Page 23. Bikeways should be evaluated for more than "exercise and enjoyment". They should receive acknowledgement for their transportation value too. A far greater emphasis should be placed on developing bikeways on the neighbor islands where the required "open space" may still be available. For example, a round-the-island bikeway, separated from the main highway on the Big Island would not only provide a safe vehicle path but a tremendous tourist attraction. The old railroad right-of-ways on all the islands would be ideal bike paths and they should be earmarked for that use now. Inclusion of the U.H. Urban and Regional Planning Program as an Assisting Organization also should be considered.

Yours truly,



John T. Harrison
Environmental Coordinator

cc: L. Stephen Lau
Jacquelin Miller
Urban and Regional Planning
Michael Graves, Anthropology